REMARKS

Claims 3-7 and 9-12 were previously pending in this application. New claims 13-23 are added herein. Upon entry of these amendments claims 3-7 and 9-23 are pending for examination with claims 11 and 15 being independent claims. No new matter has been added. Support for the new claims can be found in the originally filed claims, in Figure 1 and in the specification, at least, at: Page 5, lines 5-15; page 6, lines 6-29; and page 9, lines 2-12.

Rejections Under 35 U.S.C. §103

The Office Action rejected claims 3-7 and 9-12 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,678,002 to Frink et al. in view of U.S. Patent No. 6,636,221 to Morein (hereinafter "Morein").

The Office Action rejects claims 3-7 and 9-12 under 35 U.S.C. §102(b) as being unpatentable over U.S. Patent No. 6,678,002 to Frink et al. (hereinafter "Frink") in view of U.S. Patent No. 6,636,221 to Morein (hereinafter "Morein"). Applicants respectfully disagree because the cited references either alone or in proper combination do not teach or suggest any of: 1) "a graphics chip having at least two video inputs for respectively receiving said at least two real-time uncompressed digital video streams;" 2) a graphics chip "used for ... video editing of said at least two real-time uncompressed digital video streams;" or 3) a graphics chip "further comprising a video output for providing edited uncompressed digital video streams," as recited in claim 11. In addition, the Applicants respectfully assert that there is no suggestion or motivation to combine the references.

Independent claim 11 recites "a graphics chip having at least two video inputs for respectively receiving said at least two real-time uncompressed digital video streams, said graphics chip further having a 2D graphics engine and a 3D rendering engine respectively for providing 2D and 3D functions used for said video editing of said at least two real-time uncompressed digital video streams, said graphics chip further comprising a video output for providing edited uncompressed digital video streams."

Frink describes "a system provides real-time previsualization of effects to be added to high definition (HD) video data and real-time rendering of the HD video data including the added effects." (Abstract.) The system in Frink includes "an HD video system (104) connected

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by a bus (144) to an HD storage system (102)." (Col. 2, lines 50-51.) A disk buffer memory (114) "receives a sequence of digital still image[s]" which may be sent through one or more codecs (116) "to reduce overhead when linear devices are used with the non-linear access storage system (102)." (Col. 5, lines 19-31.)

Morein describes a graphics processing system that includes a graphics processing circuit (10) and enhanced memory (20). The graphics processing circuit in Morein processes graphics data. As is understood by those of ordinary skill in the art, graphics data differs from digital video streams because digital video streams are provided in a video data format. As a result, the graphics circuit in Morein is not adapted to receive real-time uncompressed digital video streams. Thus, Morein lacks any video input for receiving real-time uncompressed digital video steams let alone "at least two video inputs for respectively receiving said at least two real-time uncompressed digital video streams," as recited in claim 11.

As described in Morein, "the graphics processing pipeline (110) preferably includes a 3D graphics processing pipeline that receives graphics primitives and produces pixel fragments based on these primitives [and] ... may also include a two-dimensional (2D) graphics processing block that generates additional graphics data for display." As is well known by those of ordinary skill in the art, a digital video stream does not provide graphics primitives but instead provides data in a video format. Nowhere does Morein describe that the graphics processing circuit (10) can include an input for data in a video format. Accordingly, the graphics circuit in Morein does not include any video input adapted to receive a real-time uncompressed digital video stream let alone two video inputs adapted to receive real-time uncompressed digital video streams. Further, Morein also fails to teach or suggest a graphics chip "used for said video editing of said at least two real-time uncompressed digital video streams," or a "video output for providing edited uncompressed digital video streams."

Concerning the rejection of claim 11, the Office Action acknowledges that Frink "fails to disclose a graphics chip having at least two video inputs for respectively receiving said at least two real-time uncompressed digital video streams, said graphics chip further having a 2D graphics engine and a 3D rendering engine respectively for prov[id]ing a 2D and 3D functions used for video editing of said at least two real-time uncompressed digital video streams, said graphics chip further comprising a video output for providing edited uncompressed digital video

streams," and then relies on Morein to modify Frink. (Office Action at page 4.) As described above, the combination of Frink and Morein fails to teach or suggest all the limitations of claim 11, at least, because the references do not disclose "a graphics chip having at least two video inputs for respectively receiving said at least two real-time uncompressed digital video streams."

Not only do the references fail to teach or suggest all the claim limitations, Frink and Morein also fail to provide any suggestion or motivation to combine the references. In particular, Frink does not suggest any unresolved challenges concerning editing a plurality of real-time uncompressed digital video streams, and Morein does not suggest that a graphics circuit can be applied to perform editing on a plurality of real-time uncompressed digital video streams or even receive digital video streams as input. As stated in MPEP §2143, "the teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in the applicant's disclosure." *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

The statement on pages 5-6 of the Office Action alleges that "it would have been obvious to one of ordinary skill in the art ... to use video editing apparatus, as disclosed by Frink et al., and incorporate a system wherein 2D and 3D rendering engines are able to handle the functions for display, as disclosed in Morein." Further to the immediately preceding paragraph, Frink and Morein fail to suggest any benefit provided by the asserted combination. In addition, an alleged teaching that a graphics circuit including 2D and 3D rendering engines can be employed to produce display signals does not teach or suggest "a graphics chip having at least two video inputs for respectively receiving said at least two real-time uncompressed digital video streams, said graphics chip further having a 2D graphics engine and a 3D rendering engine respectively for providing 2D and 3D functions used for said video editing of said at least two real-time uncompressed digital video streams, said graphics chip further comprising a video output for providing edited uncompressed digital video streams," at least, because the alleged teaching does not include a graphics chip with at least two video inputs for respectively receiving said at least two real-time uncompressed digital video streams, let alone employing the graphics chip for editing the at least two real-time uncompressed digital video streams.

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For all of the above reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 11 and claims 3-7, 9, 10 and 12 which each depend either directly or indirectly from allowable independent claim 11.

CONCLUSION

In view of the foregoing amendments and remarks, reconsideration is respectfully requested. This application should now be in condition for allowance; a notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is requested to call the Applicant's attorney at the telephone number listed below.

A petition and fee for a two month extension of time are included herewith. If this response is not considered timely filed in view of the petition and fee and if a request for an extension of time is otherwise absent, Applicant hereby requests any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 50/2762, Ref. No. M1073-700719.

Respectfully submitted,
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